

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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COMPLEX SYSTEMS, INC.,	:
	:
Plaintiff,	:
	:
v.	:
	:
ABN AMRO BANK N.V.	:
	:
Defendant.	:
	:
----- X	

Civil Action No. 08-cv-7497 (KBF)
ECF CASE

**DECLARATION OF
JEFFREY I. KAPLAN, ESQ.**

**DECLARATION OF JEFFREY I. KAPLAN, ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT ON LIABILITY**

I, Jeffrey I. Kaplan, hereby state as follows:

1. I am counsel for Complex Systems, Inc. (CSI) in the above-identified matter;
2. Exhibit 1 hereto is a true and correct copy of a Professional Services Agreement ("PRSA") entered into between plaintiff and ABN AMRO Information Technology Services Company ("IT") in July 2000.
3. Exhibit 2 hereto is a true and correct copy of a template or standard form of a PRSA to be entered into between IT and other companies before the changes made by IT and CSI;
4. I certify under penalty of perjury that the foregoing is true and correct when based upon personal knowledge, and is believed to be true and correct when based upon information and belief.

Dated: April 26, 2013

By: s/ Jeffrey I. Kaplan/
Jeffrey I. Kaplan, Esq.